

II. Remarks

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1-5, 9, and 11-28 are pending in the application. Claims 1 and 22 are independent.

Applicants have added new Claims 16-28 to afford themselves a scope of protection commensurate with the disclosure. The new claims are fully supported in the specification (see the "Linked Video Files" section of the substitute specification; paragraphs **[0082]** *et seq* in the sub spec; paragraphs **[0095]** *et seq* in the published application), and are believed to be allowable for the reasons to be developed below.

Claims 1-5, 9, and 11-15 were rejected as being unpatentable over Berberet, Gerba, and Gupta, for the reasons noted at pages 2-7 of the Office Action. Applicants respectfully traverse all art rejections.

Each of independent Claims 1 and 22 recites a novel/non-obvious combination of structure and function whereby a real time interactive video system has memory structure (or a server) configured to store (i) a sequence of frames of video content, and (ii) separate linked video files that are not embedded in the video content and that identify the frames and locations of pixel objects in said frames. Notably, the linked

video files are stored based on **a sample rate which is a multiple of plural standard playback rates.** In the disclosed embodiments, the sampling rate is 3 FPS, which is a multiple of standard frame rates such as: NTSC, 30 FPS, PAL, 15 FPS, 12 FPS, and the movie content disclosed in the application (known to be 24 FPS).

In contrast, none of the art cited in the case (including Berberet, Gerba, and Gupta discloses or suggests such a combination of features. Accordingly, it is respectfully suggested that the pending claims are fully patentable over the cited art.

The Examiner's attention is respectfully directed to U.S. Patent Nos. 5,708,845, and related 6,496,981; and to related U.S. Patent Application No. 09/815,020 (US 20020056136), all to Wistendahl, et al. Each of these documents discloses structure and function for mapping "hot spots" in media content. These documents are cited in a concurrently-filed Information Disclosure Statement.

In view of the above, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3507. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP

By: /Richard P. Bauer/
Attorney for Applicants
Richard P. Bauer
Registration No. 31,588

KATTEN MUCHIN ROSENMAN LLP
1025 Thomas Jefferson Street, N. W.
East Lobby: Suite 700
Washington, D.C. 20007-5201
Telephone: (312) 902-5200
Facsimile: (312) 902-1061